GRANDMOTHERS AGAINST GENOCIDE

Org. nr. 935 375 088 – Drammen, Norway

Criminal Complaint for Complicity in Genocide, Complicity in Crimes Against Humanity and Complicity in War Crimes in Gaza

The complaint concerns four Norwegian individuals:

Prime Minister Jonas Gahr Støre,
Foreign Minister Espen Barth Eide,
Finance Minister Jens Stoltenberg – and
former Finance Minister Trygve Slagsvold Vedum

To:

Kripos, Section for International Crimes

Date: April 16, 2025

From: The association Grandmothers Against Genocide,

Org. no. 935 375 088, 3039 Drammen

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1. Introduction

This complaint is submitted on the basis of

- The Penal Code § 101, cf. §§ 21 and 22
- The Penal Code § 102, cf. §§ 15, 21 and 22
- The Genocide Convention art. III(e)
- The Rome Statute art. 25(3)(c)
- The ICJ ruling (January 26, 2024), paragraph 50, which emphasizes that all states have an obligation to act to prevent genocide

and aims to urge Kripos to initiate an investigation of four Norwegian political leaders for possible complicity in genocide and/or complicity in crimes against humanity and complicity in war crimes, in connection with Israel's ongoing military operations in Gaza and the West Bank.

It is assumed that there is no doubt that Israel is violating all the rules covered by Articles 6, 7, and 8 of the Rome Statute – namely Genocide, Crimes Against Humanity and War Crimes.

The accusation of complicity therefore applies to all the crimes that Israel is guilty of.

Criminal liability for complicity under international law:

Rome Statute, Article 25(3) (b and c):
https://lovdata.no/dokument/TRAKTAT/traktat/1998-07-17-2

"3. In accordance with this Statute, a person shall be criminally responsible and liable for punishment for a crime within the jurisdiction of the Court if that person:

b) orders, solicits or induces the commission of such a crime which in fact occurs or is attempted, and

c) for the purpose of facilitating the commission of such a crime, aids, abets or otherwise assists in its commission or its attempted commission, including providing the means for its commission."

Genocide Convention Article III (e):

https://lovdata.no/dokument/TRAKTAT/traktat/1948-12-09-1

"The following acts shall be punishable:

e. complicity in genocide."

Article IV reads:

"Persons committing genocide or any of the other acts enumerated in Article III shall be punished, whether they are constitutionally responsible rulers, public officials or private individuals."

The complaint will demonstrate that the actions of the perpetrators are covered by the provisions prohibiting incitement to, aid and encouragement of the commission, as they have contributed financially to the commission of the crime, and by providing the means for its implementation.

This complaint is submitted in accordance with Norwegian and international legal understanding, in which public prosecution applies for the most serious crimes. There is therefore no requirement of personal legal interest to file a complaint concerning crimes falling under Chapter 16 of the Penal Code. Should the correct legal provisions be missing in the complaint, we assume that the basis of the complaint will lead Kripos to independently find the paragraphs most relevant for the case.

Clarification on Complicity under Norwegian Law

Penal Code §15 on Complicity states that “A penal provision also applies to anyone who aids and abets the offence, unless otherwise specified.”
This complaint is limited to the most obvious actions. There is no doubt that the actions have been committed, and that the accused are directly responsible for the actions.

They have had and currently have the authority to decide that Norway:

- invests in Israeli companies that contribute to the illegal occupation of Palestine through the Oil Fund
- invests in companies that arm Israel and thus contribute to the genocide
- invests in German, American, and other companies that supply weapons to Israel
- sells weapons components produced in Norwegian, state-owned companies, which are used in Israel's warfare

Regarding the Requirement of Intent

Penal Code §101 requires that complicity occurs "intentionally", but §§21 and 22 state that intent can exist in several forms, including what in legal practice is referred to as eventual intent (dolus eventualis).

This means that a person is criminally liable if he or she:

• Is aware that the principal offender intends to commit a criminal act

• Understands that their own action may contribute to a criminal act, and

• Nevertheless chooses to carry out the action and accepts the risk

This applies even if the individual did not aim for the crime to occur.

In any case, the term “intentionally” cannot reduce criminal liability under Norwegian law in relation to international law, as established in Odelsting Proposition 8 (2007-2008) regarding complicity. What is required is that persons suspected of complicity in various ways may have encouraged the acts – provided so-called moral support – and aided and abetted the acts. Investments in companies contributing to warfare thus fall under “encouragement of”. Sale of weapons or weapon parts to the principal offender clearly falls under the description of encouraged, incited, or aided the crime – by providing the means – i.e. weapons – that Israel has used in its warfare.

The encouragement and moral support are further reinforced by the fact that the sale constitutes a defined legal offense:

Sale of weapon parts used in Israel’s warfare is a violation of the UN Arms Trade Treaty,

which Norway ratified in 2014:

The Arms Trade Treaty establishes a prohibition against export if there is a risk that the weapons to be exported could be used for genocide and war crimes.

Article 6-3:

3. A State Party shall not authorize any transfer of conventional arms covered under Article 2 (1) or of items covered under Article 3 or Article 4, if it has knowledge at the time of authorization that the arms or items would be used in the commission of genocide, crimes against humanity, grave breaches of the Geneva Conventions of 1949, attacks directed against civilian objects or civilians protected as such, or other war crimes as defined by international agreements to which it is a Party.

In support of the presence of intent is also the fact that the political leadership of the country has systematically failed to fulfill the obligation to do everything in their power to attempt to prevent genocide.

The duty of UN member states is clarified in the ICJ ruling:

ICJ, Order on Provisional Measures, 26 January 2024

Application of the Convention on the Prevention and Punishment of the Crime of Genocide (South Africa v. Israel):

*"The Court recalls that the obligation of States to **prevent genocide** is one of conduct and not of result; the obligation is to employ **all means reasonably available to them**, so as to prevent genocide so far as possible. A State cannot be under an obligation to succeed, whatever the circumstances, but it is **under an obligation to act**."*

It is therefore not decisive whether the ICJ has determined that a genocide has taken place or not. The duty is to do everything within a state's power to ***prevent*** genocide.

The intent is further proven by the fact that the Norwegian Government has not only failed to follow the call to action but has also clearly expressed its intention to reject the ICJ's request:

The Government has assessed the duty to act to prevent genocide and concluded that the Norwegian state does not have such an obligation. The international legal framework is unmistakable. With this statement, it is made clear that the current leadership of the country has no intention of fulfilling the duty to attempt to prevent genocide.

The justification given is that Norway is not close enough to Israel to be subject to the obligation to prevent. To this, it must be said that when the countries closest to Israel's crimes are directly complicit, the duty to prevent weighs even more heavily on the next link. If the government's assertion were to be accepted as universally applicable, the Genocide Convention's provisions on obligations for member states would effectively be rendered meaningless. That is impossible, and the conclusion must therefore be that the government's justification for refraining from its international obligations is so incorrect that it, in itself, confirms intentional complicity.

As this denial of responsibility is published on the Government's official website, it can be seen as a public encouragement to the principal offender – by confirming that Norway does not intend to take *any* action that could help stop Israel's violations of international law.

Summary Regarding Intent:

The individuals reported have had ongoing and thorough knowledge of the humanitarian and international law situation in Gaza, based on:

• Warnings from the UN, WHO, Amnesty International, and other international bodies

• The ICJ's ruling of January 26, 2024, with a clear call to action

• Statements from Israeli leadership expressing explicit intent to carry out mass extermination and ethnic cleansing of Gaza's population

• Bombing of the civilian population in Gaza for 17 months, with an intense escalation after Israel broke the ceasefire on March 18

• Humanitarian organizations worldwide have warned of a famine crisis in Gaza since May 2024. This has dramatically worsened after Israel blocked all supplies of food and water in March this year

Despite this, the four reported individuals have:

• Maintained financial investments in Israeli companies

• Rejected demands to withdraw financial support to Israel through investments

• Maintained investments in weapons manufacturers that arm Israel

• Maintained the sale of Norwegian weapons components that contribute to Israel's warfare

In our assessment, this constitutes eventual intent and therefore meets the conditions for complicity under Penal Code §§ 101 and 102, cf. §15, as well as all applicable international regulations.

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2. The Reported Individuals

All have held key roles in shaping and managing Norwegian policy and economic relations with Israel in the period from October 2023 to April 2025.

Prime Minister Jonas Gahr Støre (Labour Party)

Role and Responsibility:

• Supreme political leader of the Labour Party and head of the country's government
• Has overarching responsibility for government policy, including foreign policy and international relations and responses
• Former Minister of Foreign Affairs – possesses deep knowledge of the Israel-Palestine conflict

Statements and Actions:

• Over many years, both as former Foreign Minister and current Prime Minister, Støre has emphasized Israel's right to self-defense. He did so again after October 7
• He has failed to protest against Israel's violations of international law; the illegal occupation and the many expansions of illegal settlements. He has not criticized the illegal blockade of Gaza. *Protest and criticism* is here meant as directed at Israel with concrete measures
• Has continued Norwegian economic cooperation with actors linked to the occupation and accepted that the Oil Fund retains investments in companies involved in Israel's occupation and warfare
• Has approved the sale of Norwegian-produced weapons components that contribute to Israel's warfare
• The Palestinian-Norwegian Association and four other organizations sent a request to the Prime Minister on August 29, 2024, in connection with the start of the school year, when 80% of the schools in Gaza had been bombed (see Appendix 4). They asked that Støre demand a halt to the bombings. This was never answered. At no point from October 7, 2023, to the present date has Støre protested to Israel or demanded that the bombings stop
• In connection with Norway's recognition of Palestine in May 2024, Støre made a statement against better knowledge, during the televised press conference on May 22 when he said:

"The terror was committed by Hamas and militant groups – which are not supporters of a two-state solution, and which also do not recognize the state of Israel."

These are claims that Jonas Gahr Støre knows to be false. That the Prime Minister has knowingly and willfully presented a falsehood on national television to the whole population is a serious accusation, and we have therefore elaborated on this in Appendix 5.

Foreign Minister Espen Barth Eide (Labour Party)

Role and Responsibility:

• Responsible for Norway's foreign policy, including UN voting, diplomatic statements, and support for international processes.
• Key person in all assessments of international law, international humanitarian law, and bilateral policy towards Israel and Palestine.

Statements and Actions:

• Has for many years clearly stated that Norway recognizes Israel's right to self-defense.
• For an equally long time, has failed to criticize Israel's illegal occupation, expansion of settlements, blockade of Gaza, bombing of civilian targets and other war crimes.
• Has stated in Parliament that measures against Israel would be counterproductive and an obstacle to the peace efforts. This is a clear rejection of any protest against Israel and must therefore be understood as direct support for Israel.

Finance Minister Jens Stoltenberg – (Labour Party)

Key Points:

• As former Prime Minister, he has shown long-term and consistent support for Israel's "right to self-defense," regardless of context. He has played a central role in shaping Norwegian policy toward Israel/Palestine.
• As Prime Minister, he expressed one-sided support for Israel's security needs, with little or no support for the security needs of Palestinians.
• Over decades, has shown very little or negligible criticism of Israel's violations of international law.
• As Finance Minister in Støre's government, he rejected a request from Save the Children to divest from companies supporting Israel's illegal occupation and warfare. The letter from Save the Children is Appendix 6. It contains a thorough legal justification for Norway's obligations under international law. Stoltenberg's rejection of this strengthens the case for his complicity.

Stoltenberg has and has had:

• In-depth knowledge of violations of international law, based on publicly available information about the situation in Gaza.
• The ability to act, by giving instructions regarding the Oil Fund's investments.
• Failed to end Israeli investments despite strong calls to do so from, among others, UN Special Rapporteur Francesca Albanese
• A political practice that includes actively legitimizing Israel's military actions

Specifically for the three Labour Party leaders:

Documented support for Israel's warfare over many years. After Israel broke the ceasefire on March 18 and intensified bombing of civilians, none of them voiced any critizism towards President Donald Trump, who is responsible for supplying Israel with the largest bombs. It is also beyond any doubt that Trump's openly declared political support for ethnic cleansing and the delivery of "earthquake bombs" has directly led to Israel's dramatically intensified military offensive.

The Labour leaders failed to protest, despite the fact that each of them had the full ability to contact the president and express their condemnation. In light of Israel's intensified bombing of Gaza in recent times, it must be assumed that such a lack of protest is perceived as acceptance – by both Israel and the USA – and thereby also as encouragement from the international community, of which Norway is a part.

This lack of protest in the face of horrific war crimes, combined with continued ownership and weapons sales, constitutes, in the case of the Norwegian Labour Party leadership, criminal complicity.

Former Finance Minister Trygve Slagsvold Vedum (The Centre Party)

Role and Responsibility:

• Had authority over the Government Pension Fund Global (the Oil Fund) and Norwegian financial policy during the relevant period from October 7, 2023, until he stepped down on February 4, 2025
• The Oil Fund's investments constitute financial complicity in violations of international law, particularly when investments are made in companies involved in the occupation and warfare

Actions and Policies:

• Under Vedum, the Ministry of Finance maintained investments in companies contributing to the occupation, such as Caterpillar, and in companies arming Israel
• Few or no noticeable measures were taken to divest from Israeli-related investments in the Oil Fund after the most intense bombings in Gaza began in autumn 2023

In addition, for all four: weapons support to Israel

In Parliamentary Representative's Proposal 138S (2024–2025) it is stated:

"It is further thoroughly documented that Norway has not taken any action to prevent weapons support to Israel via the United States, as Norway still allows American re-export of defense materials produced in Norway and from subsidiaries in the United States in which the Norwegian state holds significant ownership shares.
Lockheed Martin, the manufacturer of the F-35 fighter jet used by Israel in its warfare on the Gaza Strip, has confirmed to FriFagbevegelse.no that all F-35 aircraft contain, among other things, fuselage parts from the Norwegian Kongsberg Group.
Nammo has eight factories in the USA and has supplied, among other things, M72 anti-tank weapons and M141 Bunker Buster missiles to the USA, which have forwarded these to Israel."

Espen Barth Eide, as Foreign Minister, has done nothing to stop Norway's sale of weapons components to the USA, despite knowing that they would be used in Israel's warfare. In addition, in December 2024 – after 14 months of Israeli bombing of Gaza – the government approved contracts for five Norwegian companies with Lockheed Martin. The purpose of the contracts is to develop new weapons. It must be considered entirely evident that such new weapons, developed with the help of Norwegian technology, will be sold by Lockheed Martin to Israel, as the company, the world's largest arms manufacturer, is one of the main suppliers to Israel's military efforts.

The Oil Fund has also invested significantly in German companies that sell ammunition and weapons to Israel, such as Rheinmetall and ThyssenKrupp. These weapons are being used in Gaza. The aforementioned companies also appear on the Jewish Virtual Library's list of companies that profited from the Holocaust during World War II. As leader of the Labour Party, Jonas Gahr Støre has had no objection to the state investing in former Holocaust companies that were co-responsible for the extermination of Jews during the war.

The Oil Fund also holds investments in a wide range of companies of various nationalities that supply Israel's war industry – including six of the world's largest weapons manufacturers. This is further detailed in Appendix 7.

The Council on Ethics for the Oil Fund has, in contrast to this, stated that it is within their mandate to recommend investments related to Israel's occupation. The Finance Minister holds full responsibility for everything the Council on Ethics states and what the Oil Fund does. The Council's reasoning is presented as evidence that Trygve Slagsvold Vedum, as Finance Minister, has disregarded Norwegian and international law. This has been continued by the current Finance Minister Jens Stoltenberg, and makes both of them responsible for illegal support of Israel's warfare.

3. About the Situation in Gaza

Facts as of April 2025:

• Over 60,000 Palestinians have been killed since October 7, 2023, according to the UN and Palestinian health authorities. More than 21,000 of the deceased are children.

• Over 75% of Gaza's population (more than 1.5 million people) are internally displaced and living in tent camps under extremely unsafe conditions.

• More than 66,000 bombs have been dropped on Gaza since October 2023

• After March 18, 2025, Israel began using so-called "bunker buster bombs" – also referred to as "earthquake bombs." See Appendix 1 for further details.

• Large residential areas, tent camps, hospitals, and schools have been regularly targeted.

• Drinking water and sanitation conditions are catastrophic. Israel blocks the entry of clean water, fuel, and food. This is intentional policy, confirmed by Israeli leaders themselves.

• Gaza has been on the brink of famine since May 2024. In March 2025, OCHA declared that over 80% of children under five in northern Gaza suffer from acute malnutrition.

4. Lack of Action

During the period in question, the four individuals have:

• Failed to demand a ceasefire during critical phases. Failed to demand a halt to the bombings.

• Did not implement any measures whatsoever that could have demonstrated a national stance condemning Israel's warfare. See Appendix 2 – regarding what they could have done – had they had any interest at all in influencing Israel to slow down its military actions.

5. Request

On the basis of the above, we therefore request that Kripos:

initiate an investigation of Jonas Gahr Støre, Espen Barth Eide, Jens Stoltenberg and Trygve Slagsvold Vedum for complicity in genocide, complicity in crimes against humanity, and complicity in war crimes.

6. Attachments and Documentation

• Appendix 1: Israel's bombings after March 18 of this year – not followed by any measures
• Appendix 2: Possible measures within Norway's scope of action – not utilized
• Appendix 3: Israel's declared intentions of genocide and ethnic cleansing – globally known
• Appendix 4: Call to the Prime Minister to demand a halt to the bombings – August 29, 2024
• Appendix 5: Especially aggravating for Jonas Gahr Støre: The speech to the nation on May 22, 2024, containing knowingly false claims
• Appendix 6: Letter from Save the Children to Jens Stoltenberg urging divestment
• Appendix 7: Overview of companies the Oil Fund invests in that arm Israel

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7. Conclusion

In our view, it is crucial that not only direct perpetrators but also complicit political actors are investigated and, if applicable, held accountable for their role in an established or potential crime against humanity and genocide.
We remind that Norway, as a State Party to both the Genocide Convention and the Rome Statute, is legally obligated to investigate serious international crimes, especially when its own citizens and public officials may be involved. Furthermore, that Kripos is the authority responsible for fulfilling this obligation to investigate. A failure to do so may itself constitute a breach of Norway's international obligations.
What has been outlined in this complaint, in our assessment, constitutes sufficient grounds to initiate an investigation.

8. Contact and Further Dialogue

We remain available to elaborate on the assessments and provide additional documentation as needed. Contact email: prelude84@proton.me. We will also submit further documentation in support of the complaint, in addition to the 7 appendices included here.

Sender:

Grandmothers Against Genocide,

Marianne Bergvall, leader

Drammen, Norway